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FEDERAL MARITIME COMMISSION

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September 30, 2003

Honorable Bryant L. Van Brakle  
Secretary  
Federal Maritime Commission  
800 North Capitol Street, N.W.  
Washington, D.C. 20573

RE: Petition of National Customs Brokers and Forwarders  
Association of America, Inc. for a Limited Exemption From  
Certain Tariff Requirements of the Shipping Act of 1984

Petition No. 03 -

Dear Secretary Van Brakle:

I am Barbara Hiebendahl, Vice President of Marketing for Euro Cargo Express, Inc.

Euro Cargo Express, Inc is a licensed OTI, NVOCC operating under license number # 14956N (Bond# 89900022). Currently we have 3 offices in the United States (New York, Miami and recently Los Angeles). We operate mostly as import Freight Forwarders/ NVOCCs from Spain (where our agent has 4 offices); Italy (out of the Florence office); Portugal (from Lisbon and Porto); as well as Brazil, where our chosen agent has several offices throughout the country (they too are licensed NVOCCs with their own tariff on file with the Federal Maritime Commission).

The cost to maintain tariff is high for a company our size. Below find an analysis of our approximate costs per year:

1. The annual cost of subscribing to a tariff publishing service is approximately \$948 USD (monthly maintenance fee).

NY. 15409 146<sup>th</sup> Ave, Jamaica, New York 11434 USA  
MIA 2550 N W. 72<sup>nd</sup> Ave; Suite #208 Miami, FL 33122 USA

\*Tel: 718/978-0808 Fax. 718/276-5443  
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September 30, 2003

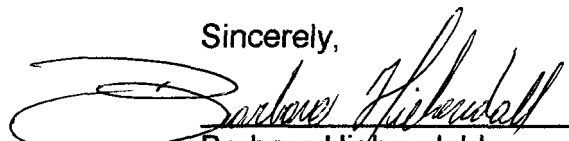
2. The approximate cost for filing rates or making changes to tariff \$685 USD.
3. Yearly Bond \$500.
4. We have calculated that our company spends approximately \$3,000 for the cost of our staffs salary spent in supervising and actually filing the rates, approving invoices, etc, which are related directly or indirectly to rate tariff compliance.

The bottom line is that our company is spending over \$5,000 for the maintenance of the tariffs which we believe is not useful to our company or to our customers. As far as we know we are not able to track the number of times shippers or other persons have accessed our tariff. The tariffs are not being properly used by our customers or potential customers to determine who they give the business to. In addition, we find it that other **NVOCCs** are not properly filing the rates, and illegal competition happens every day, therefore this is only affecting ethical companies like ours and we are not really covered or protected by having to file rates, if anything we are being punished by having to do so.

I, Barbara Hiebendahl declare under penalty of perjury that the foregoing is true and correct. Further I certify that I am qualified and authorized to file this verified statement.

Executed on September 30, 2003.

Sincerely,

  
Barbara Hiebendahl

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